BAAQMD Responses to EPA Comments on Proposed Renewal Title V Permit and Statement of Basis for General Chemical West, LLC; Plant A0023, Application 8907

Comment #1: The permit must include the citation to the BAAQMD's state plan that was approved by EPA in accordance with 40 CFR Part 60, Subpart Cd, which is the emission guidelines and compliance deadlines for sulfuric acid production units. Although the permit references 60.30d to 60.32d of the emission guidelines as applicable requirements for S-1 and S-24 in table IV, the permit must include the requirements of BAAQMD's actual state plan for sulfuric acid production units.

Response: The District and EPA Region 9 cannot find a copy of the District's state plan submitted pursuant to 40 CFR 60, Subpart Cd. However, the ultimate result of the plant was the adoption of District Regulation 12, Rule 6, "Acid Mist from Sulfuric Acid Plants". The applicable requirements of this regulation are listed in the part IV tables for S-1 and S-24.

Comment #2: Please clarify whether 40 CFR Part 63, Subpart ZZZZ applies to S-34 caustic pump diesel engine and S-36 natural gas-fired IC engine. The rule applies to units at major or area sources of HAP emissions, except if the stationary RICE is being tested at a stationary RICE test cell/stand. If the rule applies, it must be included in the permit.

Response: S-34 and S-36 are subject to 40 CFR 63, Subpart ZZZZ. Therefore, we have added the applicable provisions of this NESHAP to the part IV and VII tables for S-34 and S-36.

Comment #3: Please address, in the statement of basis, whether Compliance Assurance Monitoring (CAM) applies to the following equipment. If CAM does apply, the permit must include these requirements.
S-1, S-16, S-24:
Control device - SO2 abatement system and mist eliminator
Emission limits - limit SO2 emissions to no more than 300 ppm @ 12% O2; limit SO3 and H2SO4 emissions to less than 0.04 grain/dscf; limit acid mist emissions to no more than 0.15 gram per kilogram (0.3 lb/ton) of acid produced
S-3, S-10, S-13, S-16, S-17, S-18, S-32:
Control device - activated carbon beds, caustic scrubber
Emission limits - limit hydrocarbon emissions to 0.37 lb/hour; limit SO2 emissions to 10 pppmv; limit H2SO4 emissions to 5 ppmv; Limit SO2 emissions to 0.09 lb/hr; limit H2SO4 emissions to 0.014 lb/hr
S-1:
Control device - Emergency caustic scrubber
Emission limits - limit SO2 emissions to 51 ppmv; limit H2SO4 emissions to 0.3 lb/ton of acid produced; limit SO3 and/or H2SO4 emissions to 0.04 grain/dscf
S-36:
Control device: NSCR
Emission limits: 0.15 g/bhp-hr NOx; 0.6 g/bhp-hr CO; 0.15 g/bhp-hr POC

Response: We have added a CAM Applicability table to the Statement of Basis that shows why CAM does not apply to the sources listed above for each pollutant and corresponding emission limitation. In some cases, CAM does not apply because the potential pre-control device emissions for the sources are less than the Major Source thresholds. In other cases, CAM does not apply because the source is equipped with a CEM for that pollutant.

Comment #4: The statement of basis states that the facility uses a mist eliminator for reducing sulfuric acid emissions and for recovering sulfuric acid. It also lists examples and states that EPA has determined that a mist eliminator is considered to be inherent process equipment because of these examples. Please provide more information on these examples, which are cited in the statement of basis.

Response: We have removed from the statement of basis the list of examples where EPA has determined that a mist eliminator is considered to be inherent process equipment. Instead, we have added a discussion of criteria for distinguishing inherent process equipment from control devices, as outlined in the preamble to the CAM regulation.